### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA BEAUFORT DIVISION

Alicia Holland,

Plaintiff,

v.

Beaufort County and James Beckert, Individually and in his Official Capacity,

Defendants.

Civil Action No. 9:20-cv-3479-DCN-MHC

#### NOTICE OF REMOVAL

REMOVED FROM THE BEAUFORT COUNTY
COURT OF COMMON PLEAS
CASE NO. 2020-CP-07-01766

# TO THE HONORABLE JUDGE OF THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT OF SOUTH CAROLINA, BEAUFORT DIVISION:

Pursuant to <u>28 USC §1441</u>, Defendant James Beckert gives notice of the removal of Case

Number 2020-CP-07-01766 from the Court of Common Pleas for Beaufort County, South

Carolina, to the United States District Court for the District of South Carolina, Beaufort Division.

In support of removal, Defendant James Beckert shows the following:

This civil suit commenced on 8 September 2020 by the filing of a Summons and Complaint in the Court of Common Pleas for Beaufort County. According to the filed Affidavits of Service [Exhibit A], the Plaintiff served the Complaint [Exhibit B] on the wife of Defendant James Beckert, at their residence on 9 September 2020. Jonathan J. Anderson, Esquire, and Jonathan L. Anderson, Esquire appear for Defendant James Beckert. Hugh W. Buyck, Esquire, appears for Beaufort County.

The Complaint alleges causes of action arising under 42 USC § 1983 and deprivation of constitutional rights secured by the Constitution and Laws of the United States of America. As such, the United States District Court has original jurisdiction over this action pursuant to 28 USC §1331 (Federal Question) and 28 USC §1343 (Civil Rights Cases). The Defendant may remove this suit to the United States District Court as one or more of the claims arise under the Constitution and laws of the United States of America. 28 USC §1441(a) and (c).

Holland v. Beckert, et al. Notice of Removal

### ANDERSON REYNOLDS & STEPHENS, LLC

## /s/ Jonathan J. Anderson

Jonathan J. Anderson (Federal Bar Number 1086)
Jonathan L. Anderson (Federal Bar Number 12756)
37 ½ Broad Street
P.O. Box 87
Charleston, SC 29401
(843) 723-0185 –phone
(843) 405-0313 –fax
janderson@arslawsc.com
landerson@arslawsc.com

Attorneys for James Beckert, individually and in his official role.

September 30, 2020 Charleston, South Carolina